

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ZHU ZHAI HOLDINGS LIMITED)
And PETER PUI TAK LEE,)
Plaintiffs)
v.) Case No. 2020-CV- 4985
STEVEN IVANKOVICH,) Honorable Sharon Johnson Coleman
Defendant) Special Master Hon. Sidney Schenkier

VERIFICATION

I have am the individual defendant and also the manager of and the person who on behalf of Pilgrim Windtree LLC, Pilgrim Coulter LLC, Pilgrim Warwick LLC, Alliance HTFL LLC and Alliance HTTX LLC the ["Pilgrim LLCs"] together with Shanna Willis the Vice President of Atlas Homes Asset Management compiled the attached list of bank accounts pursuant to the Special Master Order Number 1 entered on March 19, 20024 [Doc. No. 305]

XX The matters stated in the foregoing document are true to my own knowledge except as to those matters which are stated on information and belief and identify bank accounts based upon a diligent search of the financial records kept by the "Atlas" entities. I believe them to be true .

Pursuant to the Special Master Order on or about March 19, 2024, I requested Ms. Willis to search all of the financial records of the numerous "Atlas" companies and to make a list of the identity of all bank accounts of any entity on which I was an authorized signatory to a bank or investment account, within the time period set forth in the Order.

Many of the identified accounts are not active accounts,. They are identified in the interest of full transparency.

The list was compiled from the "Atlas" financial records as kept in the ordinary course of the business.

The "Pilgrim" JP Morgan Chase bank accounts were previously produced.

The "Pilgrim" PNC bank statements were previously produced.

It is believed that the identity of the Celedon accounts in the names of the limited liability entities were identified and Statements were previously produced.

The Plaintiffs' had in this case issued a citation to Stifel Nicolaus & Company, Incorporated. "Stifel," filed an Answer to Citation Proceeding on March 24, 2022 [oc. No. 153]. The citation answer identified 14 accounts of limited liability companies that I, as the Manager of those entities, had signatory authority.

I am the Manager of intervening LLC and on behalf of myself I am authorized to make this verification for and on our behalf, and I make this verification for that reason.

Dated March 27, 2024.

Signatures following page:

Pilgrim Windtree LLC.
BY: Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich Manager

Pilgrim Coulter LLC.
BY: Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich Manager

Pilgrim Warwick LLC.
BY: Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich Manager

Alliance HTFL LLC
BY: Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich, Manager

Alliance HTTXLLC
BY: Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich, Manager

Steven Ivankovich
Steven Ivankovich (Mar 27, 2024 12:19 EDT)
Steven Ivankovich Individually